



*Consulting Engineers
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April 12, 2007
(PBW Project No. 1381)

VIA OVERNIGHT COURIER

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: March 2007 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO and the Statement of Work (SOW) attached thereto). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
 - Subtask 6.3 – Validation and evaluation of analytical data for soil samples collected from the on-site soil boring and surface soil sample locations were performed.
 - Subtask 6.6 – Validation and evaluation of analytical data for surface water samples from four Phase 2 wetland sample locations north of Marlin Avenue were performed.
 - Subtask 6.7 – Validation and evaluation of analytical data for sediment samples from 17 Phase 2 wetland sample locations north of Marlin Avenue were performed.
 - Subtask 6.8 – A pathway-specific risk assessment for the fish ingestion pathway was prepared and submitted to EPA on March 20, 2007.
 - Acquisition of access to properties immediately north of Marlin Avenue within the background soil area (UAO Paragraph 72) – access to these properties was

denied by the properties owner. A letter of denial received from the properties owner's attorney was forwarded to you via e-mail on March 12, 2007. Five of the ten proposed background soil samples are located on these properties.

- Although not required by the UAO, debris/trash removal and subsequent mowing activities were performed at the Site this month. These activities were proposed in a letter to you dated February 19, 2007, and were authorized by your letter of March 1, 2007. As part of these activities, approximately four roll-off bins (approximately 40 cubic yard volume each) of trash/debris were removed from the Site and disposed at the Seabreeze Environmental Landfill in Angleton, Texas. Consistent with directions in your March 1 letter, all material collected as part of these activities was inspected for visible chemical staining or mud/soil adhering to the material. Material with chemical staining or adhering soil was collected in plastic containment drums and has been staged on-site for later disposal.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- Revised pages for previously submitted laboratory reports for Phase 2 wetland surface water and sediment samples, and tank content samples are provided in electronic form by sample delivery group on the enclosed DVD.
 - Validation reports for wetland surface water and sediment data are provided in electronic form by sample delivery group on the DVD provided with this report.
 - The updated database, including all data validated through March 31, 2006 is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
 - Subtask 6.3 – Soil investigation – to be continued through additional soil sample collection, sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through additional monitoring well installation and development, groundwater sample collection, sample analyses, analytical data validation, and data evaluation.
 - Subtask 6.6 – Surface water investigation – to be continued through analytical data evaluation.
 - Subtask 6.7 – Sediment investigation – to be continued through analytical data evaluation.

4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 35% complete. The following delays were encountered this month:

(1) The aforementioned denial of access to five of the ten background soil sampling locations has delayed and is continuing to delay soil investigation activities. We are working with you to mitigate the length of this delay through your contact of the property owner, and through the evaluation of alternative background sample locations.


(2) Significant rainfall at the Site during late March required postponement of monitoring well installation activities that were scheduled to start on March 19. To date, Site conditions have not allowed rescheduling of these activities. Should Site conditions persist in delaying these activities, we will evaluate relocation of proposed monitoring wells to more accessible areas, or possible use of alternative means of access to the proposed locations.

At present, it is uncertain how the above delays will affect the overall schedule for completion of the RI/FS.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

Attachments

cc (with DVD): Mr. Doug McReynolds – EA Engineering, Science and Technology

cc (w/o DVD): Ms. Luda Voskov – Texas Commission on Environmental Quality
Mr. Brent Murray – Environmental Quality, Inc.
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morriss III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP